



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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May 24, 2002

VIA E-MAIL AND U.S. MAIL

Barbara Anne Sousa, Esq.
Bell Atlantic - Massachusetts
185 Franklin Street
Boston, MA 02110-1585

Re: D.T.E. 98-57-Phase III
D.T.E.'s Fourth Set of Information Requests to Verizon

Dear Ms. Sousa:

Enclosed please find the Department's Fourth Set of Information Requests to Verizon New England, Inc. d/b/a Verizon Massachusetts ("Verizon") issued in the above-captioned matter. Please submit Verizon's responses to the Department and the participants in hard copy and by e-mail within seven days of receipt. Should you have any questions please contact Jesse Reyes at (617) 305-3735.

Very truly yours,

Jesse S. Reyes,
Hearing Officer

Encl.

cc: DTE 98-57-Phase III Service List (w/encl.)

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

VERIZON NEW ENGLAND, INC.
D/B/A VERIZON MASSACHUSETTS, D.T.E. 98-57-PHASE III

FOURTH SET OF INFORMATION REQUESTS
OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
TO VERIZON NEW ENGLAND, INC. D/B/A VERIZON MASSACHUSETTS

Pursuant to 220 C.M.R. § 1.06(6)(h) and § 1.11(7), the Department of Telecommunications and Energy ("Department") submits to Verizon New England, Inc. d/b/a Verizon Massachusetts ("Verizon") the following Information Requests.

INSTRUCTIONS

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and phase of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed, but **no later than 7 days of receipt of the request.**
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the hearing officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve one (1) copy of the responses on Mary Cottrell, Secretary of the Department and on all parties; also submit one (1) copy to all Department staff, two (2) copies of the responses to Jesse Reyes, Hearing Officer.

FOURTH SET OF INFORMATION REQUESTS TO VERIZON
D.T.E. 98-57-PHASE III
May 24, 2002

1. Refer to Verizon's Response to Department's Request for Comment (Apr. 9, 2002) ("Verizon's Response"). Verizon refers to its initial deployment as a "PARTS-like offering." Please fully explain how its "PARTS-like" service differs from PARTS as was presented earlier in the proceedings in D.T.E. 98-57 Phase III.
2. Please provide all terms and conditions in Verizon's tariff to be filed with the Federal Communications Commission regarding provision of its "PARTS-like" service offering. If Verizon has not completed this filing, please provide a description of the missing terms.
3. In Verizon's letter to the Department (March 7, 2002) and attached public notice, Verizon presents its first-office application as "a wholesale end-to-end packet service." However, in Verizon's Response, Verizon states that, "the Company does not believe that a state tariff is required to proceed with its first-office application" and that "it is more appropriate to tariff this as a federal filing."
 - a. Please fully explain how In the Matter of Implementation of the Local Competition Provisions in the Telecommunication Act of 1996 and Inter-carrier Compensation for ISP-Bound Traffic, CC Docket No. 96-98 & 99-68, FCC 01-131, Order on Remand and Report and Order, ¶¶ 14, 58-59 (rel. Apr. 27, 2001), cited in Verizon's Response at 2, is relevant to Verizon's wholesale service offering, stating all facts upon which Verizon relies to provide its response.
 - b. Will the Network Interface Device and the data carriers' Point of Termination, as referenced in the attachment to Verizon's March 7, 2002 letter, be located within Massachusetts? If so, please state all facts upon which Verizon relies to assert that it does not need to file a wholesale tariff with the Department.
4. Please state all facts upon which Verizon relies to assert that the provisioning of its "PARTS-like" wholesale service is interstate in nature. Does the fact that data LECs can order network elements for the provision of xDSL services under Verizon's intrastate wholesale tariff affect this response?